

NOV 23 2005

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For The Northern Mariana Islands
By _____
(Deputy Clerk)

Attorneys for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

EQUAL EMPLOYMENT OPPORTUNITY)	CIVIL ACTION NO. 05-0029
COMMISSION,)	
)	
Plaintiff,)	ANSWER AND
vs.)	DEMAND FOR JURY TRIAL
)	
KUMANOMI ISLAND COMPANY, LTD.,)	
)	
Defendant.)	

COMES NOW Kumanomi Island Company, Ltd. and in response to the Complaint filed on September 29, 2005, states as follows:

I.

ANSWER

1. Kumanomi Island Company, Inc. ("Defendant") admits the allegations contained in paragraph 1 of the Complaint.

2. As to the allegations made at paragraph 2 of the Complaint, Defendant admits that its "employment practices" take place in this District, but denies that any of its practice are unlawful.

1 3. As to the allegations made at paragraph 3 of the Complaint, Defendant admits
2 that Plaintiff has been charged by Congress with enforcing the provisions of 42 U.S.C. §2000e-
3 5(f)(1) and (3), but denies that Plaintiff has been “expressly authorized to bring this action.”
4

5 4. As to the allegations made at paragraphs 4 of the Complaint, Defendant admits
6 that it is an employer doing business in the Commonwealth, admits that it has had 15
7 employees, and admits that it has engaged in business continuously. All other allegations are
8 denied.
9

10 5. Defendant denies the allegations contained in paragraphs 5, 7, 8, 9 and 10 of the
11 Complaint.
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13 6. Defendant lacks sufficient information to form a belief as to the truth or falsity of
14 the allegations contained in paragraph 6 of the Complaint and on that basis denies said
15 allegations.
16

17 7. As to the Plaintiffs introductory paragraph under the heading “Nature of the
18 Action”, to the extent Plaintiff actually intends by this paragraph to allege a violation of law by
19 Defendant, it is denied. The true “Nature of the Action” is apparently not known to Plaintiff or
20 it would not have brought this action.
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22 8. Defendant denies any allegation that it has not specifically admitted.
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1 9. Defendant denies that Plaintiff is entitled to receive from Defendant, the relief
2 prayed for.

3
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5 **II.**

6 **AFFIRMATIVE DEFENSES**

7 A. Plaintiff fails to state a claim upon which relief can be granted.

8 B. The Real Party in Interest has no damages.


9
10 **III.**

11 **JURY DEMAND**

12 WHEREFORE, Kumanomi Island Company, Ltd. demands trial by jury on all issues and
13 claims raised and made in the Complaint.
14

15
16 Dated: November 22, 2005.

17 Respectfully submitted,
18 O'CONNOR BERMAN DOTTS & BANES

19
20
21 By: 
22 MICHAEL W. DOTTS